

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**OLIVER SOLOMON, LEANDRA HARRELL, and MONTEZ LEWIS WHITBY**, on behalf of themselves and on behalf of others similarly situated,

Plaintiffs,

V.

**NATIONWIDE INVESTIGATIONS  
AND SECURITY, INC., and ALLEN  
HOLLIMON,**

Defendants.

[illegible]

**PLAINTIFFS' ADVISORY TO THE COURT REGARDING WHAT, IF ANY, FURTHER  
PROCEDURE IS NECESSARY BEFORE A FINAL JUDGMENT IS ENTERED**

1. Pursuant to this Court’s directive set forth in its June 29, 2022 Opinion and Order granting the Motion for Summary Judgment filed by the Plaintiffs are hereby filing this advisory to the Court regarding what, if any, further procedure is necessary before a final judgment can be entered in this matter.

2. It is Plaintiffs' contention that they have already proven damages via the Declarations that were filed with the Motion for Summary Judgment. (Doc. 113, Exhibits 1-24). In short, as set forth within the Declaration of Gregg M. Rosenberg (Doc. 113, Exhibit 24, ¶ 4-5), Plaintiffs have proven damages amounting to \$535,389.19 (Doc. 113, Exhibits 1-23). As such, according to the Fair Labor Standards Act, Plaintiffs are entitled to liquidated damages in an "additional equal amount" of \$535,389.19. Therefore, according to the Fair Labor Standards Act, Plaintiffs are entitled to receive a total of \$1,070,778.38 for actual damages and liquidated damages combined. [ $\$535,389.19 + \$535,389.19 = \$1,070,778.38$ ]. (Doc. 113, Exhibit 24, ¶ 4-5).

Furthermore, based on the fee relationship between Plaintiffs and its attorney of record, wherein Plaintiffs' attorney of record is entitled forty percent (40%) of Plaintiffs' recovery (plus the recovery of out-of-pocket expenses incurred), Plaintiffs' attorney of record is entitled to \$428,311.35 as reasonable attorneys' fees in this case. (Doc. 113, Exhibit 24, ¶ 6-12). Plaintiffs should further be awarded costs and interest.

3. Therefore, since Plaintiffs have already proven damages (Doc. 113, Exhibits 1-24), Plaintiffs do not believe that any further procedures are necessary before a final judgment can be entered into in this matter based on the uncontroverted measure of damages. Thus, Plaintiffs request that this Court enter a final judgment against Defendants, jointly and severally, as Plaintiffs' employer and award Plaintiffs the above-identified actual damages, liquidated damages, attorneys' fees, costs, and interest.

Respectfully submitted,

/s/ Gregg M. Rosenberg

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Of Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

On June 30, 2022, pursuant to the Federal Rules of Civil Procedure, the above-identified document was filed and served via the Court's CM/ECF system on the following:

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/s/ Gregg M. Rosenberg  
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